

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Erica M. Ruiz	:	CASE NO 23-12650-pmm
	:	
Debtor	:	Chapter 13
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MIDFIRST BANK	:	
	:	
Movant	:	
v.	:	
	:	
ERICA M. RUIZ	:	
	:	
Debtor	:	
	:	
MANUEL VILLANUEVA	:	
	:	
Co-Debtor	:	
	:	
KENNETH E. WEST	:	
	:	
Trustee	:	

**RESPONSE OF DEBTOR TO
MOTION OF MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

Debtor, ERICA M. RUIZ, by her attorney John M. Kenney hereby responds to the Motion of MIDFIRST BANK for Relief from the Automatic Stay, and responds accordingly as follows:

1. Admitted.
2. Admitted.
3. Denied. The Debtor can neither admit nor deny the allegations contained in paragraph 3 of the motion and same are denied as such.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. It is denied that the Debtor has failed to make the monthly payments for the alleged period.
8. Denied.

9. Denied. It is denied that the total amount necessary to reinstate the loan post-petition is the amount alleged in paragraph 9 of the motion.

10. Denied. It is denied that the Movant is entitled to relief from stay for cause.

11. Denied.

WHEREFORE, Debtor, Erica M. Ruiz, hereby prays this court would deny and dismiss the Motion of MidFirst Bank for Relief from the automatic stay.

Date: February 28, 2024

/s/ John M. Kenney
JOHN M. KENNEY, ESQUIRE
Attorney for Debtor
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